Linda S. Adams
Secretary for
Environmental Protection

California Regional Water Quality Control Board

San Diego Region

Over 50 Years Serving San Diego, Orange, and Riverside Counties
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http:// www.waterboards.ca.gov/sandiego

Arnold Schwarzenegger
Governor

August 23, 2006

In reply refer to:
LDU:File 06-0024:ctamaki

Ms. Kerry McNeill, Supervisor
Solid Waste Local Enforcement Agency
County of San Diego, Department of Environmental Health
9325 Hazard Way
San Diego, CA 92123-1217

Dear Ms. McNeill:

SUBJECT: REGIONAL BOARD COMMENTS ON REVISED PARTIAL DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE PROPOSED GREGORY CANYON LANDFILL

This letter transmits comments from the California Regional Water Quality Control Board San Diego Region (Regional Board) on the Revised Partial Draft Environmental Impact Report (RPDEIR) for the Proposed Gregory Canyon Landfill.

GENERAL COMMENTS

1. Water Rights. On July 14, 2006, the State Water Resources Control Board (SWRCB) issued an Order cancelling an application (Application 30038 filed on November 11, 1991) for water rights to divert 0.19 cubic feet per second with an annual limit of 137.5 acre-feet, for industrial purposes from the San Luis Rey River Subterranean Stream. From the information presented in the FPDEIR:

    a. It is not clear that the applicant (Gregory Canyon Limited or "GCL") has acquired the necessary rights to produce groundwater from the proposed area(s) of the site, and

    b. What restrictions may exist on the transfer/use of water produced, from various parcels of the project area, associated with water rights.

    It is the understanding of the Regional Board that that the applicant did not respond to previous attempts by the SWRCB to clarify issues associated with their water right application for diversion of water from the San Luis Rey Subterranean Stream, and the applicant has not submitted a statement of water diversion and use to the SWRCB in order to renew the permit to divert water from the San Luis Rey subterranean stream.

On August 14, 2006, the Regional Board received a hard-copy of their petition to the SWRCB for reconsideration of the Order cancelling Water Rights Application 30038. The Regional Board encourages the applicant to obtain a determination from the SWRCB on the water rights that may be necessary for proposed pumping of groundwater from wells GLA-3, GMW-1, GLA-10 for the proposed project.

COMMENTS ON GROUNDWATER ISSUES/IMPACTS

1. Section 3.2.4

Comment: On page 3-1 in paragraph 2, the siting description for the proposed project should also indicate that the current configuration shall be excavated no deeper than five feet above the highest anticipated groundwater elevation as indicated in the text of the Water Supply Report (APPENDIX C, page 10, paragraph 1). This is consistent with the information provided to the Regional Board in the Joint Technical Document (available on the Regional Board web page at http://www.waterboards.ca.gov/sandiego/units/ldu/Canyon%20Project/gregory_canyon_landfill.html) for the proposed Gregory Canyon Landfill.

2. Section 3.2.4.

On page 3-4 in paragraph 1, the added text states that *"A 50 million gallon per minute (gpm) reverse osmosis (RO) system will be installed in the southwestern portion of the ancillary facilities area as stipulated in an agreement with the San Luis Rey Municipal Water District and the applicant (Appendix C)."*

Comment: This statement should be checked and revised as necessary. Based upon the information provided to the Regional Board in the Joint Technical Document (JTD available on web site referenced above), our impression is that the proposed RO system will have a capacity of 50 gpm.

3. Section 4.15.3.3.

On page 4.15-7, paragraph 2, the text states that there are *"... 11 bedrock monitoring wells located on the north side of the landfill including wells GLA-2, GLA-3, GLA-12, GLA-13, GLA-A through GLA-G, and GMW-1."*

Comment: The Joint Technical Document (see JTD Appendix C, Attachment 1 –Boring Logs and Well Construction logs) provided to the Regional Board contains information about the lithologic units penetrated by the wells cited in the text. The information on the JTD can be obtained from the Regional Board's web page at

http://www.waterboards.ca.gov/sandiego/units/ldu/Canyon%20Project/gregory_canyon_landfill.html.
The cross-section (JTD Appendix C-1, Plate 2) indicates that there are significant thickness of sedimentary layers (labeled as Q_{UN} and Q_A that includes surficial deposits, colluvium, residual soils, and alluvium) at locations depicted for wells GLA-3, GMW-1, GLA-10, GLA-C, GLA-B, and GLA-G.

Wells GLA-3, GMW-1, GLA-10, as identified above and illustrated on Appendix C-1, Plate 2, appear to be located in proximity to well screens located below an alluvium unit that may be contiguous with the alluvial aquifer of the San Luis River floodplain (labeled as Q_A on JTD Appendix C-1, Plate 2). The cross-section (Plate 2) indicates that the top of the *"producing zones"* may occur between 10 and 28 feet directly below the base of the alluvial unit (labeled as Q_A on JTD Appendix C-1, Plate 2). It is not clear if water produced/pumped from those wells (*i.e.,* GLA-3, GMW-1, GLA-10) is derived from the underflow (water from Q_A) of the San Luis Rey, which may be classified as a subterranean stream flow by the SWRCB. The applicant should obtain a determination from the SWRCB on whether pumping water from wells GLA-3, GMW-1, GLA-10 requires that the applicant comply submit a Statement of Water Diversion and Use (in compliance with Water Code §5100 *et seq.*) for water diversion and use from the San Luis Rey River. The applicant should provide the County and the Regional Board with a hard-copy of the SWRCB's determination on this issue. Also see General Comment No. 1 above.

The RPDEIR does not explain how the wells specified in the text [**GLA-3** - proposed water level measuring well, **GMW-1**, **GLA-10** - proposed water level measuring well, **GLA-C**, **GLA-B**, and **GLA-G**] will simultaneously serve functions as both water supply wells and groundwater monitoring wells (as proposed in the Monitoring and Reporting Plan: Appendix G, page 20 and the discussion in the Joint Technical Document: http://www.waterboards.ca.gov/sandiego/units/ldu/Canyon%20Project/gregory_canyon_landfill.html) for the proposed Unit. The RPDEIR should be revised to explain how this will be effectively accomplished.

4. Section 4.15.3.10.

On page 4.15-22 in paragraph 4, the text indicates that the safe yield evaluation (43.55 acre feet per year) assumes that the *"... base and area surrounding Gregory Canyon is approximately 415 acres..."* and an average rainfall of 25 inches per year.

Comments: The text should be revised to clarify what area/features are included in the "base and area" used in the subsequent analysis.

The average rainfall cited in the text seems to be an optimistic. Using the data provided by the San Diego County Water Authority (for Lake Henshaw at

http://www.sdcwa.org/manage/rainfall-henshaw.phtml) the Regional Board calculated the following statistics on average rainfall: average calculated as 27 inches per year, with a standard deviation of 12 inches (range would be from15 to 40 inches), and a median value of 23 inches of rain per year. From our review of that data, it appears that the expected local rainfall may actually be well below the average 25 inches stated in the text.

Given the Pala Basin is a groundwater dependent community. It is not clear from the discussion in the RPDEIR how or if the analysis of *"safe yield"* took into account for other existing and future domestic water supply demands on the bedrock aquifer. The analysis should be enhanced to include this information.

There seems to be a discrepancy in the assumed/estimated annual rainfall (see discussion in Regional Board Ground Water Comment No. 5 below). If the anticipated rainfall is much less than assumed in the text, will the anticipated water production for landfill construction and operations adversely affect local water levels, and the water supplies required by other local water users/wells located in proximity to the proposed landfill?

5. Section 4.15.3.10.

On page 4.15-29 in paragraph 4, the text asserts that*: "Statistical data maintained by the County of San Diego indicates that approximately 45 inches of surficial water evaporates in San Diego County. This evaporation data indicates that 30% of the 193 acre-feet of recycled water used during peak project construction and operation or about 58 AFY would evaporate on the surface. During normal years, 865 acre-feet of rainwater is expected to fall on the project site each year."* This information is repeated again in the text of the RPDEIR Water Supply Report (see APPENDIX C, page 15, paragraph 3).

Comment: If the "project site" is defined as 1770 acres, then at an estimated rainfall producing 865 acre-ft/year results from a calculated rainfall of 0.49 ft or 5.9 inches (calculated as 865 acre-ft of rainwater / 1770 acres of area). This estimated annual rainfall appears to be substantially lower than the estimated annual rainfall of *"25 inches"* used to develop the estimated safe yield described elsewhere in the RPDEIR [see RPDEIR text page 4.15-22) and Appendix C Water Supply Report (see text discussion on page 2 of Appendix A)]. The RPDEIR does not provide a rationale or reason for this apparent discrepancy.

6. Section 4.3 Hydrogeology.

The first bullet indicates: "*A double composite liner system with an additional drainage layer and an additional HDPE membrane and a leachate collection system will be installed and monitored as required by the RWQCB.*"

Comment: The text of the RPDEIR is not clear about the design features of the proposed double composite liner system. The text of the RPDEIR should be expanded to provide the reader with a complete understanding of the proposed double composite liner system and a figure to illustrate all of the components should be added to clarify the text discussion.

The last bullet indicates: *"... Subdrain drainage system water will be reused on-site or may be discharged to the San Luis Rey River only after tests determine that the water is not contaminated in accordance with the NPDES permit.*"

Comment: The text of the RPDEIR reads as if the applicant has already received an NPDES permit from the Regional Board for discharges of subdrain effluents to the San Luis Rey River. To the knowledge of the Regional Board staff, the applicant has neither applied for nor received an NPDES permit for discharge of the subdrain system effluents into the San Luis Rey River. Please revise the text as necessary to clarify the actual situation.

APPENDIX C: WATER SUPPLY REPORT

7. Well GLA-3 Aquifer Test Data Evaluation Gregory Canyon.

The Water Supply Report concludes (see text discussion in Appendix A to Water Supply Report) that: *"The basin area surrounding Gregory Canyon is approximately 415 acres. Assuming that infiltration and aquifer recharge are approximately 5% of the approximately 25 inches of rain fall on average each year at the site, the safe yield near GLA-3 is calculated to be about 14.1 million gallons per year, or about 27 gpm."* The text also notes that the terrain in Gregory Canyon may contribute to actual recharge rates being less than the assumed value of 5% of annual precipitation.

Comment: At the annual rainfall estimated from the evaporation data (see Regional Board Regional Board Ground Water Comment No. 5 above); the estimated infiltration would seem to be proportionally reduced to 3.3 million gallons per year (or 10.2 AFY). The results of this calculation seem to be inconsistent with the assumptions used to estimate the safe yield as presented in the text (RPDEIR page 4.15-22) and in Appendix C (see text discussion on page 2 of Appendix A to the Water Supply Report).

The text seems to incorporate significantly different estimated local rainfall in different parts of the RPDEIR, as indicated above in Regional Board Ground Water Comment No. 5 above. The RPDEIR should be revised to reconcile this apparent discrepancy.

8. Paragraph 4, page 18.

The summary of cumulative impacts includes the following statement: *"Section 2.3 of this report contains a safe yield calculation. The calculation yields a cumulative pumping rate from the bedrock wells that should not exceed 27 gpm (38,880 gpd). Pumping at this level is sustainable, and will not cause any cumulative impacts to water service facilities."*

Comment: The analysis appears to be inconsistent in its use of estimated/calculated rainfall in different parts of the RPDEIR (see Regional Board Ground Water Comment No. 5 above). It is unclear how this disparity may affect the estimated safe yield and proposed production of groundwater from wells to support the proposed project.

If you have any questions regarding our Ground Water comments, please contact Ms. Carol Tamaki at 858-467-2982 or via email at ctamaki@waterboards.ca.gov.

COMMENTS ON SURFACE WATER IMPACTS

The proposed Gregory Canyon Landfill project includes the construction of a bridge over the San Luis Rey River, access roads, and the waste management unit (landfill). The excavation and grading (construction) activity within landfill footprint will impact (fill) Gregory Canyon Creek. In addition, the ancillary features of the project, including the bridge piers and abutments, will impact the San Luis Rey River and its floodplain.

9. Section 4.9.3.1 Direct/Indirect Impacts.

On page 4.9-3 the RPDEIR discusses areas that are subject to the jurisdictions of the Army Corps of Engineers (ACOE) and California Department of Fish and Game (CDFG).

Comment: This section should also discuss Waters of the State that are not regulated by the ACOE – specifically, Gregory Canyon Creek. While performing a jurisdictional delineation, the consultant (URS) did not map Gregory Canyon Creek as jurisdictional waters of the United States (U.S.). Given that condition, and the fact that Regional Board Environmental Scientists (Mr. Jeremy Hass and Mr. Christopher Means) visited the site (see Attachment 1 to this letter: Facility Inspection Form dated November 15, 2005) concluding there is a creek in the center of Gregory Canyon, the Regional Board claims jurisdiction over Gregory Canyon Creek as waters of the State and equivalent, functional, and like mitigation will be required to compensate for the loss of the creek.

"Functional and like mitigation" meaning morphologically recreating the Creek onsite or nearby and recreating the functions that would be lost. Exchanging the length of the creek impact for an area (polygon) of southern willow scrub or cottonwood scrub will not be considered adequate mitigation.

On page 4.9-5 the RPDEIR states that the proposed bridge pilings would have a significant impact.

Comment: The RPDEIR does not discuss how the pilings, the abutments, and associated riprap will act to confine the floodplain (and flood events) of the San Luis Rey River through hydromodification. The pilings and abutments are hydromodifications to the morphology of the River and as such should be thoroughly analyzed through a study that discusses the cumulative loss of functions, values and beneficial uses to waters of the U.S. and waters of the State caused by all hydromodifications, including the project-proposed hydromodifications to the River. The study should include a discussion of each beneficial use and how those beneficial uses are impacted by existing and planned hydromodifications. The study should examine the biological, geochemical, and hydrologic functions and values of the river and how they have and will (individually and cumulatively) change for each beneficial use.

10. Section 4.9.3.7 Supplemental Analysis of Impacts to Vegetation Communities.

This section discusses impacts to vegetation communities and mitigation. The RPDEIR describes mitigation as including creation, enhancement and preservation. The RPDEIR does not define these types of mitigation. The RPDEIR does not discuss restoration as a possible type of mitigation.

Comment: Commonly used definitions of creation, restoration and enhancement of waters of the U.S. and State are: 1) *"creation"* is defined as the creation of vegetated or unvegetated waters of the U.S. where they have never been documented or known to occur (*e.g.*, conversion of nonnative grassland to freshwater marsh); 2) *"restoration"* is defined as the creation of waters of the U.S. where they previously occurred (*e.g.*, removal of fill material to restore a drainage); and 3) *"enhancement"* is defined as modifying existing waters of the U.S. to enhance functions and values (*e.g.*, removal of exotic plant species from jurisdictional areas and replacing with native species). Using these definitions, will proposed project impacts to vegetation communities, waters of the U.S. and State only be creation and enhancement mitigation? Also, why was restoration not discussed as an option?

11. Section 4.9.4 Mitigation Measures and Project Design Features.

This section discusses specific mitigation measures. The RPDEIR mitigation measures (see MM 4.9-1d and -1f) state that mitigation for impacts to southern willow scrub, disturbed southern willow scrub, and cottonwood willow riparian forest will be mitigated by on-site creation or enhancement.

Comment: If enhancement were selected as the only mitigation measure, a net loss to waters of the State would occur and that would be unacceptable to the Regional Board. A combination of on-site creation and enhancement is acceptable as long as there is a minimum of 1:1 creation mitigation for impacts.

Mitigation measure MM 4.9-18 indicates that the project applicant will implement a habitat enhancement plan to improve the San Luis Rey River watershed.

Comment: The morphology of the San Luis Rey River and its tributaries should be restored where feasible within the habitat enhancement area. This is requested because modified or disturbed fluvial geomorphology encourages recruitment and invasion of non-native plant and animal species and degrades the water quality that supports the beneficial uses of native species, wildlife and rare or endangered species.

Language within the last paragraph on page 4.9-25 (mitigation measure MM 4.9-19b) states that if onsite creation or enhancement is in violation with Proposition C, that off-site habitat may be acquired for mitigation anywhere within the unincorporated area of the County of San Diego.

Comment: The Regional Board has a working Executive Officer policy requiring that impacts be mitigated within the same watershed to avoid a net loss to waters of the State within that watershed. Also, any offsite mitigation must be have a minimum of 1:1 creation component to avoid a net loss overall to waters of the State.

12. Section 4.9.5 Level of Significance After Mitigation.

On page 4.9-26, the RPDEIR indicates,

"With implementation of the mitigation measures for significant impacts to sensitive biological resources including ... southern willow scrub, open channel, coast live oak woodland, Engleman oak, arroyo southwestern toad (habitat), ... the project impacts to sensitive biological resources would be rendered less than significant since all habitat impacted would be mitigated through creation or enhancement of habitats on site or through off-site acquisition at appropriate mitigation ratios, and precautions would be taken to avoid impacts to sensitive habitat and species. With implementation of mitigation measure MM 4.9-18, on-site creation or enhancement, or off-site acquisition,

the project's contribution to cumulative impacts to biologic resources would be less than significant."

Comment: As a Responsible Agency under CEQA, the Regional Board would find the RPDEIR inadequate if this finding, as currently written, were included in the Final EIR given all the prior Regional Board comments regarding proposed mitigation.

If you have any questions regarding our comments on potential Surface Water impacts from the proposed project, please contact Mr. Mike Porter at 858-467-2726 or via email at mporter@waterboards.ca.gov.

COMMENTS ON PROPOSED USES OF RECLAIMED/RECYCLED WATER

The proposed Gregory Canyon Landfill project includes the proposed use of reclaimed/recycled wastewater for various project related purposes. The Regional Board has the following comments on the assertions made in the text [see discussion in section 4.15.3.8 of the RPDEIR] concerning the use(s) of reclaimed/recycled water in the proposed project:

13. Master Reclamation Permit for Reclaimed Wastewater.

The Proposed Gregory Canyon Landfill is located in the Pala Hydrologic Sub Area (903.21 Hydrologic Subarea or HSA). This project would not be covered under the Master Reclamation Permit for Olivenhain Municipal Water District 4S Ranch Wastewater Treatment Plant (Order No, R9-2003-0007) or Santa Fe Valley Water Reclamation Plant (Order No. 2002-0013). These permits specify that all discharges from the 4S Ranch Wastewater Treatment Plant and Santa Fe Water Reclamation Plant must be located within the Solana Beach Hydrologic Area (905.10 Hydrologic Area or HA).

There may be other recycle water agencies within the vicinity of the landfill that may be considered as possible sources for recycled water. If another agency is selected, the Regional Board would have to review that agency's requirements to determine whether the proposed landfill falls within the area specified in the requirements and that the recycled water agency has the authority to add and regulate new users. To the knowledge of the Regional Board, the proposed landfill site has not been designated by any recycle water agency for the use of recycled water.

14. Application for Use of Recycled Water in the Proposed Project.

The Regional Board has not approved the use of recycled water for this proposed landfill site. In order to commence the use of recycled water, Waste Discharge Requirements and/or Water Recycling Requirements would need to be obtained for the Gregory Canyon landfill from the Regional Board. A Report of Waste Discharge must be submitted to the Regional Board in order to determine the appropriate requirements needed for use of recycled water at the proposed landfill.

If the use of recycled water has the potential to adversely impact groundwater quality objectives in the Pala Hydrologic Subarea (903.21 HSA), then additional measures must be taken to avoid such impacts. Please note that the water quality objectives are more stringent in the Pala Hydrologic Subarea (903.21 HAS) than those in the Solana Beach Hydrologic Area (905.10 HA). If it can be demonstrated that there will be no impacts to groundwater and surface water, then water reclamation requirements would still be necessary to ensure protection of public health and to prohibit offsite runoff of recycled water.

If you have any questions regarding our comments on the proposed use(s) of reclaimed/recycled water, please contact Ms. Michelle Mata (858) 467-2981 or via email at mmata@waterboards.ca.gov.

The heading portion of this letter includes a Regional Board code number noted after "In reply refer to:" In order to assist us in the processing of your correspondence please include this code number in the heading or subject line portion of all correspondence and reports to the Regional Board pertaining to this matter.

If you have any questions regarding this letter, please contact the appropriate Regional Board staff members identified in this letter.

Respectfully,

John H. Robertus

JOHN H. ROBERTUS
Executive Officer

JHR:mm:jro:bdk:cc:mv:mgp:cat:

Attachments: California Regional Water Quality Control Board, San Diego Region Watershed Management Program: Facility Inspection Report, dated November 15, 2005.

cc: Mr. Steven Herrera, SWRCB Water Rights Division - Water Rights Permitting Section

Mr. Rich Boylan, SWRCB Land Disposal Program

Mr. John Odermatt, RWQCB Land Disposal Program

ATTACHMENT 1

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD - SAN DIEGO REGION
WATERSHED MANAGEMENT PROGRAM

FACILITY INSPECTION REPORT

INSPECTION DATE: **11/15/05** Time: 0930 WDID/File No. 05C-095

FACILITY: **GREGORY CANYON LANDFILL BRIDGE**

FACILITY REPRESENTATIVE(S) PRESENT DURING INSPECTION: Bill Magdych and Darrell ? (URS Corp)

Gregory Canyon, LLC
NAME OF OWNER, AGENCY OR PARTY RESPONSIBLE FOR DISCHARGE — OWNER CONTACT NAME AND PHONE #

FACILITY OR DEVELOPER NAME (if different from owner) — FACILITY OR DEVELOPER CONTACT NAME AND PHONE #

SR-76, 2 miles east of I-15, Fallbrook, San Diego County
FACILITY STREET ADDRESS — FACILITY CITY AND STATE

APPLICABLE WATER QUALITY LICENSING REQUIREMENTS

- ☐ **MS4 URBAN RUNOFF REQUIREMENTS NPDES NOS. CAS0108758, CAS0108740 or CAS0108766**
- ☐ **GENERAL PERMIT ORDER NO. 99-08-DWQ, NPDES NO. CAS000002 – CONSTRUCTION**
- ☐ **GENERAL PERMIT ORDER NO. 99-06-DWQ, NPDES NO. CAS000003 - CALTRANS**
- ☐ **GENERAL OR INDIVIDUAL WASTE DISCHARGE REQUIREMENTS**
- ☐ **GENERAL OR INDIVIDUAL WAIVER OF WASTE DISCHARGE REQUIREMENTS**
- ☒ **SECTION 401 WATER QUALITY CERTIFICATION**
- ☐ **CWC SECTION 13264**

INSPECTION TYPE (Check One)

A1 ____ "A" type compliance--Comprehensive inspection in which samples are taken. (EPA Type S)

B1 ____ "B" type compliance--A routine nonsampling inspection. (EPA Type C)

02 ____ Noncompliance follow-up--Inspection made to verify correction of a previously identified violation.

03 ____ Enforcement follow-up--Inspection made to verify that conditions of an enforcement action are being met.

04 ____ Complaint--Inspection made in response to a complaint.

05 ***X*** Pre-requirement--Inspection made to gather info. relative to preparing, modifying, or rescinding requirements.

06 ____ No Exposure Certification (NEC) - verification that there is no exposure of industrial activities to storm water.

07 ____ Notice of termination request for industrial facilities or construction sites - verification that the facility or construction site is not subject to permit requirements (**Type, NOT I or NOT C - circle one**).

08 ____ Compliance Assistance Inspection - Outreach inspection due to discharger's request for compliance assistance.

INSPECTION FINDINGS

N Were violations noted during this inspection? (Yes/No/Pending Sample Results)

_N__ Were samples taken? (N=no) If YES then, G= grab or C= Composite and attach a copy of the sample results/chain of custody form

I. COMPLIANCE HISTORY:

- 401 Cert application received 9/29/05
- Status complete

FACILITY: Gregory Canyon Bridge **WDID/File #: 05C-095** **INSPECTION DATE: 11/15/05**

II. FINDINGS (See attached photos)

- Application is to construct bridge over San Luis Rey River to provide access to Gregory Canyon landfill site. Applicant states that no 401/404 is necessary for landfill footprint area within Gregory Canyon.
- San Luis Rey river site has vigorous riparian habitat, water was flowing. Some exotics (esp. tamarisk).
- Gregory Canyon is called non-jurisdictional in application. Area had cut banks and signs of flow. Appears to be an ephemeral channel. It supports oak woodland and some mule fat.

III. RECOMMENDATIONS AND ADDITIONAL COMMENTS

- Ephemeral channel in Gregory Canyon should be considered a water of the State (if not Federal). Avoidance is infeasible, so on-site mitigation should be proposed and evaluated.
- Good opportunities for enhancement (exotic eradication) and restoration adjacent to San Luis Rey.
- Site needs to identify post-construction BMPs for new bridge and associated road.
- Site needs to identify post-construction BMPs for ancillary operation areas on site. WDR will be issued for landfill, and industrial NPDES may apply for operations, but those requirements will not cover ancillary areas and roads. Therefore, BMPs should be spelled out for 401. The 401 application (EIR) notes a clarifier for one part, but no BMPs for other impervious areas, including ancillary operations, roads, parking, SR-76 widening, etc.

IV. SIGNATURE SECTION

Inspection Report received by :

FACILITY REPRESENTATIVE	SIGNATURE	TITLE	DATE

JEREMY HAAS		11/15/05
STAFF INSPECTOR	SIGNATURE	INSPECTION DATE

VI. (For internal use only)

Reviewed by Supervisor:_____ Date

cc:

Inter-office Referral: 1) _____ 2) _____ 3) _____ 4) _____ 5) _____

FACILITY: Gregory Canyon Bridge **WDID/File #: 05C-095** **INSPECTION DATE: 11/15/05**

Figure 1. Site location. Landfill canyon is steep canyon SE of "enter here."

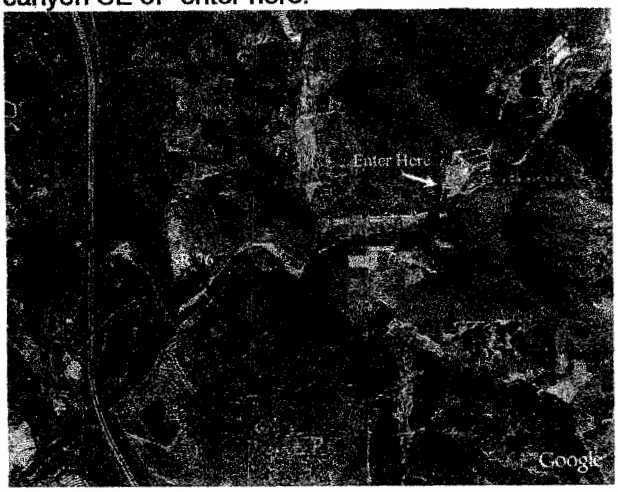


Figure 2. Looking south toward San Luis Rey River (riparian) and Gregory Canyon in background.

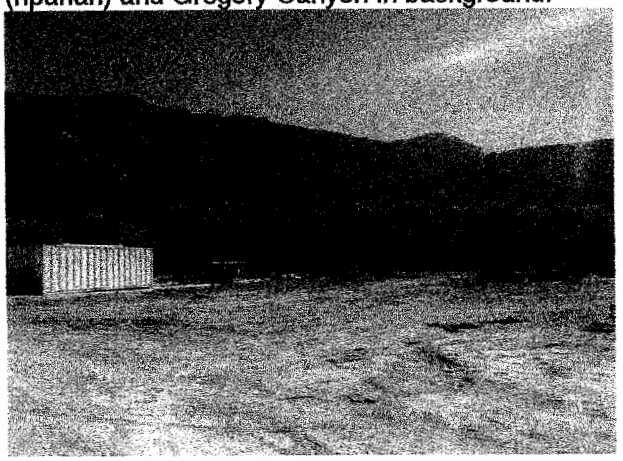


Figure 3. Pylon denotes bridge crossing location.

Figure 4. SLR at south crossing area.

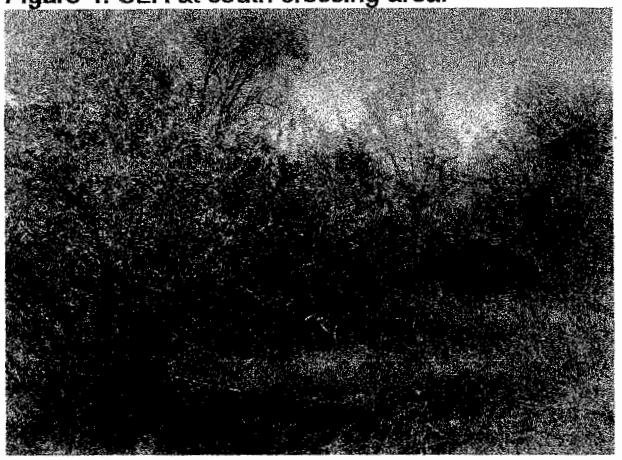


Figure 5. SLR upstream of crossing (left bank). Flow was at right bank during site visit.

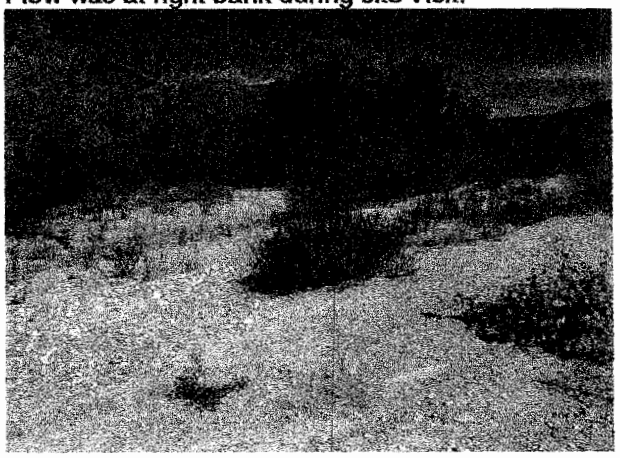
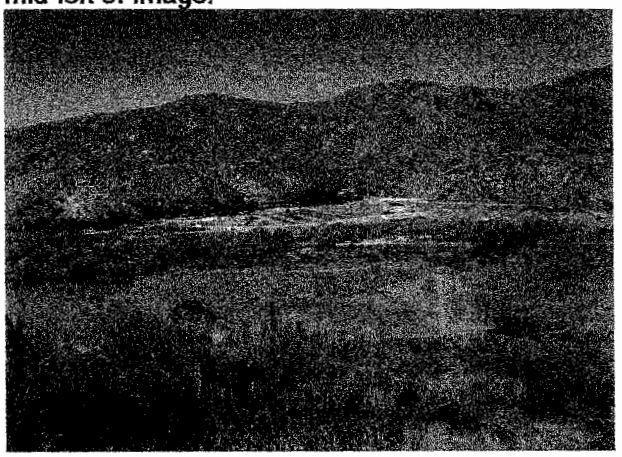


Figure 6. Looking north toward river crossing. Dirt road is aqueduct easement. Proposed bridge in mid-left of image.



FACILITY: Gregory Canyon Bridge **WDID/File #: 05C-095** **INSPECTION DATE: 11/15/05**

Figure 7. Looking NE at Gregory Canyon confluence with San Luis Rey.

Figure 8. On-site wetland near aqueduct on south side, just west of "knoll".

Figure 9. Looking east across Gregory Canyon.

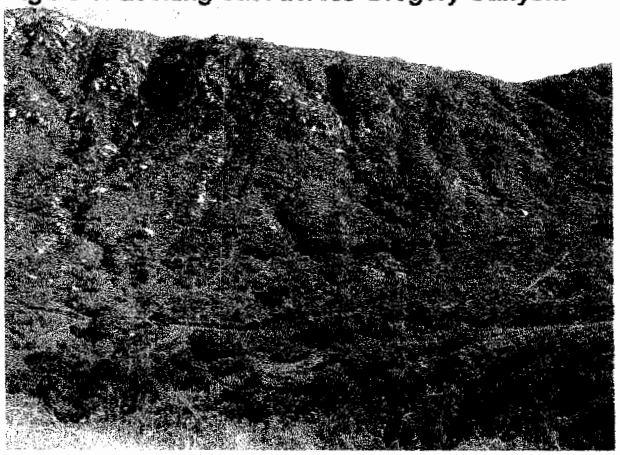


Figure 10. U/S at existing crossing of Gregory Canyon channel.

Figure 11. Lower Gregory canyon channel.

Figure 12. Lower Gregory canyon channel.

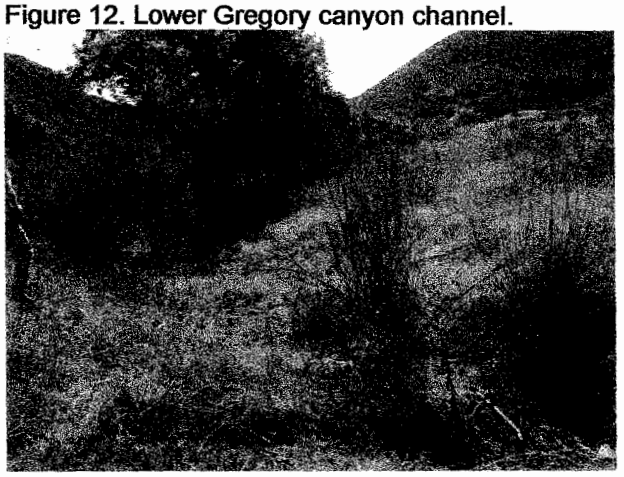


Figure 13. Lower Gregory canyon channel. Vicinity of Well "MW5".

Figure 14. Lower Gregory canyon channel. Vicinity of Well "MW5".

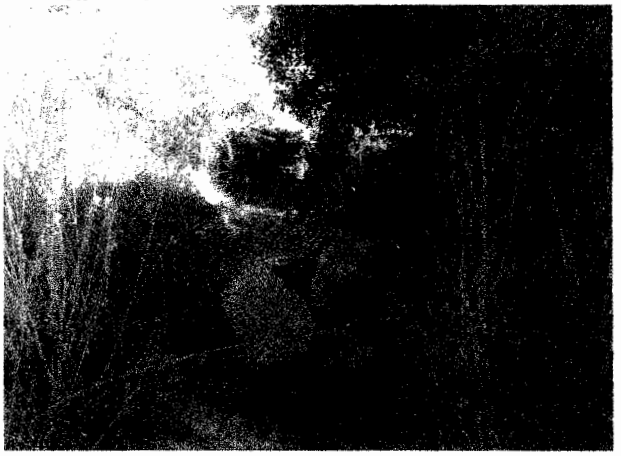


Figure 15. Lower Gregory canyon channel. Vicinity of Well "MW5".